

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

CONDITIONAL MAJOR (DRAFT PERMIT) No. F-06-040

ARVINMERITOR COMPANY

FRANKFORT KY.

JULY 25, 2006

D. BRIAN BALLARD, REVIEWER

SOURCE I.D. #: 021-073-00051

SOURCE A.I. #: 38098

ACTIVITY #: APE20040001

SOURCE DESCRIPTION:

ArvinMeritor Heavy Vehicle Systems in Frankfort paints axles, hubs, drums and suspensions for class 8 vehicles. The parts are manufactured elsewhere and manually painted in open-face booths.

An application for renewal of the facility's Conditional Major permit was received on June 8, 2004. The facility is currently operating under permit F-99-019 (Revision 3).

COMMENTS:

Particulate emissions are controlled by 3 sided spray booths with filters. The manufacturer estimates 94 percent collection efficiency and 98 percent particulate removal for the collected air stream. The painting is assumed to have a thirty (30) percent transfer efficiency and all other particulates used are assumed to be emitted. The overall control efficiency of the booths is then applied to determine the after-control emissions.

The emission of Volatile Organic Compounds (VOC) is determined by material balance assuming the entire content of VOC in the paint is emitted. The facility no longer has the potential to emit Hazardous Air Pollutants (HAPs) above major source thresholds. This is due to butyl cellosolve (CAS No. 111-76-2) being removed from the list of HAPs effective November 29, 2004 (Refer to Federal Register, Volume 69, Number 228).

EMISSION AND OPERATING CAPS DESCRIPTION:

VOC emissions shall not exceed 90 tons during any consecutive twelve (12) month period. Monthly records to demonstrate compliance with this limitation shall be maintained, and total VOC emissions shall be reported semiannually.

The booths will be required to use filters and be operated and maintained in accordance with the manufacturer's recommendations in order to be in compliance with the opacity and mass standards specified in 401 KAR 59:010.

PERIODIC MONITORING:

Given the control devices used (filters) at the booths, there is little chance of violating a mass or opacity standard. For this reason, direct measurements of mass and opacity emissions will not be required but some assurance that the filters are working properly will be needed. Visual inspection of the filters each day painting is done and proper maintenance are sufficient to assure that the filters are working properly.

Only record keeping is required to demonstrate compliance with the applicable Conditional Major limitation.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.